

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

Case No. 22-11150-GG
L.T. Case No. 9:18-cv-80176-BB

IRA KLEIMAN, as the Personal Representative of the Estate of David Kleiman,
Plaintiff-Appellant,

v.

CRAIG WRIGHT,
Defendant-Appellee.

**RIVERO MESTRE'S
UNOPPOSED MOTION TO WITHDRAW AS COUNSEL**

Andrés Rivero
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Counsel for Appellee

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Eleventh Circuit Rule 26.1, Rivero Mestre LLP, respectfully submits the following Certificate of Interested Parties and Corporate Disclosure Statement:

1. The Honorable Judge Beth Bloom, U.S. District Judge
2. Boies Schiller Flexner LLP, Counsel for Plaintiff-Appellant
3. Brenner, Andrew, Counsel for Plaintiff-Appellant
4. Brown, Amy Christine, Counsel for Defendant-Appellee
5. BTCN 1610-491 LLC (CE)
6. Cech Samole, Brigid F., Counsel for Defendant-Appellee
7. Delich, Joseph, Counsel for Plaintiff-Appellant
8. Devine Goodman & Rasco, LLP, Counsel for non-party Andrew O'Hagan
9. Economides, Constantine Philip Counsel for Plaintiff-Appellant
10. Estate of David Kleiman, Plaintiff-Appellant
11. Fernandez, Amanda Lara, Counsel for Defendant-Appellee
12. Fernandez, Michael Alexander, Counsel for Defendant-Appellee
13. Freedman, Velvel, Counsel for Plaintiff-Appellant
14. Freedman Normand & Friedland LLP (formerly Roche Freedman LLP), Counsel for Plaintiff-Appellant

15. *Freur, Leonard, Counsel for Defendant-Appellee
16. Galbo, Robert, Counsel for Defendant-Appellee
17. Gillenwater, James Evans, Counsel for Defendant-Appellee
18. Glaser, Patricia, Counsel for non-party John Doe
19. Glaser Weil Fink Howard Avchen & Shapiro LLP, Counsel for
nonparty John Doe
20. Greenberg Traurig LLP, Counsel for Defendant-Appellee
21. Harrison, Laselve, Counsel for Plaintiff-Appellant
22. Henry, Allison, Counsel for Defendant-Appellee
23. *Holtzman, Alexander, Counsel for Plaintiff-Appellant
24. Kass, Zalman, Counsel for Defendant-Appellee
25. Kleiman, Ira, Plaintiff-Appellant
26. Kuntz, Robert, Counsel for Defendant-Appellee
27. Lagos, Stephen, Counsel for Plaintiff-Appellant
28. Licata, Samantha, Counsel for Plaintiff-Appellant
29. *Lohr, Whitney, Counsel for Defendant-Appellee
30. *Markoe, Zaharah, Counsel for Defendant-Appellee
31. Mestre, Jorge, Counsel for Defendant-Appellee
32. Pandher, Bethany J. M., Counsel for Defendant-Appellee
33. Payne, Darrell Winston, Counsel for non-party John Doe

34. Pritt, Maxwell, Counsel for Plaintiff-Appellant
35. Rasco, Guy Austin, Counsel for non-party Andrew O'Hagan
36. The Honorable Judge Bruce Reinhart, U.S. District Magistrate Judge
37. Rivero, Andres, Counsel for Defendant-Appellee
38. Rivero Mestre LLP, Counsel for Defendant-Appellee
39. Roche Freedman LLP (now Freedman Normand & Friedland LLP),
Counsel for Plaintiff-Appellant
40. Roche, Kyle, Former Counsel for Plaintiff-Appellant
41. Rolnick, Alan, Counsel for Defendant-Appellee
42. Rosenson, Alexa Jane, Counsel for Defendant-Appellee
43. Scherker, Elliot H., Counsel for Defendant-Appellee
44. Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A., Counsel
for non-party John Doe
45. Tenjido, Daniella, Counsel for Defendant-Appellee*
46. Wright, Craig, Defendant-Appellee
47. Zack, Stephen, Counsel for Plaintiff-Appellant

* = no longer involved in representation

Appellee certifies that no other judges, attorneys, persons, associations of persons, firms, partnerships, or corporations have an interest in the outcome of this appeal.

Rivero Mestre LLP and its attorneys, Andrés Rivero, Jorge A. Mestre, Robert Kuntz, Alan Rolnick, Schneur Kass, Michael A. Fernández, Amanda Fernandez, Amy Brown, and Allison Henry (“Rivero Mestre”) respectfully move to withdraw as counsel of record for Dr. Craig Wright. In support of this request, Rivero Mestre states as follows:

1. Dr. Wright has discharged Rivero Mestre as counsel.
2. In accordance with Rule 4-1.16(a)(3) of the Rules Regulating the Conduct of the Florida Bar, Rivero Mestre is required to withdraw from representing Dr. Wright.
3. Dr. Wright has engaged as new counsel Elliot H. Scherker, Brigid F. Cech Samole and Bethany J. M. Pandher from Greenberg Traurig, all of whom have made an appearance on the record.

Rivero Mestre also seeks the removal of Amanda McGovern and Daniela Tenjido as counsel of record. Ms. McGovern passed away in April of 2023, and Ms. Tenjido is no longer employed with Rivero Mestre and has not represented Dr. Wright since at least July of 2022. Both attorneys are listed as counsel of record on the docket. In an abundance of caution, Rivero Mestre also seeks their removal as counsel of record.

For the good reasons stated above, Rivero Mestre respectfully requests that the Court grant its request to withdraw.

Date: August 31, 2023

Respectfully submitted,

By: s/ Andres Rivero
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CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because it contains 209 words. This motion also complies with typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using Microsoft Word Office Version 2013 and 14-point Times New Roman type style.

/s/ Andres Rivero

CERTIFICATE OF SERVICE

I CERTIFY that on August 31, 2023, I electronically filed this document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Andres Rivero